

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
2 A Limited Liability Partnership,
3 Including Professional Corporations
4 SEONG KIM, Cal. Bar No. 166604
5 shkim@sheppardmullin.com
6 KENT RAYGOR, Cal. Bar No. 117224
7 kraygor@sheppardmullin.com
8 1901 Avenue of the Stars, 16th Floor
9 Los Angeles, California 90067
10 Telephone: 310.228.3700
11 Facsimile: 310.228.3701

12 LAURA L. CHAPMAN, Cal. Bar No. 167249
13 lchapman@sheppardmullin.com
14 TONI QIU, Cal. Bar No. 302268
15 tqiu@sheppardmullin.com
16 Four Embarcadero Center, 17th Floor
17 San Francisco, California 94111-4109
18 Telephone: 415.434.9100
19 Facsimile: 415.434.3947

20 Attorneys for Plaintiff and Counter-Defendant
21 FOREVER 21, INC.

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13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

15 FOREVER 21, INC., a Delaware corporation, Plaintiff and Counter-Defendant,
16 v.
17 GUCCI AMERICA, INC., a New York corporation, Defendant and Counter-Claimant.

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Case No. 2:17-cv-04706 SJO (Ex)

PLAINTIFF AND COUNTER-DEFENDANT FOREVER 21, INC.'S NOTICE OF MOTION AND MOTION TO COMPEL DEFENDANT AND COUNTER-CLAIMANT GUCCI AMERICA, INC. TO PRODUCE TESTIMONY AND DOCUMENTS RELATING TO CONSUMER SURVEYS AND UNRETAINED EXPERTS

Date: August 24, 2018
Time: 9:30 a.m.
Judge: Mag. Judge Charles F. Eick

Complaint Filed: June 27, 2017
First Amended
Complaint Filed: November 17, 2017
Second Amended
Complaint Filed: December 5, 2017
Pretrial Conference: October 5, 2018
Trial Date: October 23, 2018
Judge: Hon. S. James Otero

1 TO THE COURT AND ALL PARTIES AND THEIR RESPECTIVE COUNSEL
2 OF RECORD:

3 PLEASE TAKE NOTICE that, on August 24, 2018, at 9:30 a.m., or as soon
4 thereafter as the matter can be heard, in the courtroom of the Honorable Charles F.
5 Eick, located at the Roybal Federal Building and United States Courthouse, 255 East
6 Temple Street, Los Angeles, CA, 90012, Courtroom 750, 7th Floor, Plaintiff and
7 Counter-Defendant Forever 21, Inc. (“Forever 21”) will, and hereby does, move to
8 compel Defendant and Counter-Claimant Gucci America, Inc. (“Gucci”) to Produce
9 Testimony and Documents Relating to Consumer Surveys and Unretained Experts.

10 This motion is based on this Notice of Motion, the parties' Joint Stipulation
11 regarding the Motion, the supporting Declaration of Toni Qiu and the exhibits
12 attached thereto, all filed concurrently herewith, all pleadings, papers, and other
13 documents in the Court's file in this action, those matters of which the Court may
14 take judicial notice, the arguments of counsel made at the hearing, and such other
15 matters as the Court may consider.

16 | Dated: August 3, 2018

SHEPPARD, MULLIN, RICHTER & HAMPTON
LLP

By */s/ Laura L. Chapman*

SEONG KIM

KENT RAYGOR

RA L. CHAI

TONI QIU

Attorneys for Plaintiff and Counter-Defendant
FOREVER 21, INC.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 3, 2018

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By _____ */s/ Laura L. Chapman*
LAURA L. CHAPMAN

Attorneys for Plaintiff and Counter-Defendant
FOREVER 21, INC.